DOCUMENT RESUME

ED 123 483 CE 007 315

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TITLE Developing an Internship Program in Simulated Distributive Education Programs.
INSTITUTION Kentucky State Dept. of Education, Frankfort. Bureau of Vocational Education.
REPORT NO VT-102-803
PUB DATE Sep 75
NOTE 51p.

EDRS PRICE MF-$0.83 HC-$3.50 Plus Postage.
DESCRIPTORS *Distributive Education; *Guidelines; Instructor Coordinators; *Internship Programs; *Program Coordination; *Program Development; Records (Forms); Scheduling; Secondary Education; Work Experience Programs

ABSTRACT

The document provides guidelines for the teacher-coordinator in the establishment of an internship program in distributive education. The objectives of an internship program in distributive education are enumerated and procedures are suggested for its initiation. The duties of a teacher-coordinator are listed and guidelines are presented for scheduling, rotation of students, orientation of training sponsors and students, labor regulations, development of an internship agreement, transportation and supervision of students, development of the training plan, and evaluation of the program. Grids and calendars offering suggestions for student rotation are appended, along with a sample business survey form, internship agreement form, training plan form, and suggested outline of occupational experiences. Examples of students' evaluation summaries of observation experiences, student progress report form, and student progress chart are also appended. (NJ)

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Developing A Distributive Education Internship Training Program

by Dr. Clayton Riley, Western Kentucky University,
and Mrs. Betty Turner, Bureau of Vocational Education

U S DEPARTMENT OF HEALTH, EDUCATION & WELFARE
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Bureau of Vocational Education
Kentucky Department of Education

September, 1975

CE007315

FOREWORD

Teamwork is the key to an effective educational program. This teamwork is evidenced in this *Guide for Developing An Internship Program in Simulated Distributive Education Programs.* This guide is the product of teacher education, distributive education teacher-coordinators, Kentucky Department of Education, and cooperating businessmen.

This handbook was prepared as a guide for teacher-coordinators of distributive education programs in Kentucky for initiating and operating an Internship Training Program.

It is hopeful that this handbook will be of value to those who are seeking methods to enrich their programs and provide the most comprehensive education program possible.

Will T. Jeffrey, Director
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State Department of Education
Frankfort, Kentucky

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Vocational Education
Owensboro, Kentucky

VT 102-803

PREFACE

The purpose of this guide is to provide a practical reference that will be particularly helpful to teacher-coordinators in initiating internship programs.

Our sincere thanks to each of the field test Owensboro businessmen; Gene Linney, Manager, J. C. Penney; David Smith, Wyndall Enterprises; Bruce Whitmer, Green River Insurance and Realty Company; and Ron Lucas, Mr. Wiggs Discount.

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BACKGROUND

In 1938, when the distributive education program was initiated in Kentucky, the State was primarily agrarian, and distributive education was limited to the youth in the metropolitan areas. Kentucky rural youth were limited, in the main, in their opportunities for the traditional cooperative distributive education programs due to lack of training stations, and in some instances, because of their social and economic background. Therefore, a proposal was approved in May, 1968, by the Kentucky Resources Development Unit to conduct a developmental program in distributive education utilizing simulated occupational experiences in four area vocational-technical schools.

The purpose of the developmental program utilizing simulated occupational experiences was to assist in serving the educational needs of rural youth who would otherwise have been denied a program in distributive education by:

1. Developing a procedure for training high school students in distributive education utilizing simulated occupational experience;

2. Developing specifications for a simulated laboratory for providing occupational experience;

3. Developing a curriculum utilizing laboratory training for 11th and 12th grade students;

4. Determining the facilities and equipment needed;

5. Developing, trying out, evaluating and refining instructional materials;

6. Evaluating the effect of the program on adoption of distributive education programs in cooperating schools;

7. Evaluating the effectiveness of simulated experiences in securing and maintaining employment in distributive occupations.

The Distributive and Marketing Education Unit, of the Kentucky Bureau of Vocational Education, selected four schools to participate in the two-year developmental program. A workshop was held for participating teacher-coordinators. A course of study, teaching aids, instructional methods, and procedures for initiating a program were developed. The facilities and equipment needed for programs were determined, criteria for selection of students were identified and procedures for evaluating the program were outlined.

The developmental project resulted in the establishment of simulated programs as an integral part of the total distributive education effort in Kentucky. The success of the original program proved that simulation could be used effectively. The programs were effective in isolated rural areas where training stations were not available as well as in urban areas. The distinct advantages of utilizing simulation were:

1. Rural youth, lacking a training station in their home community, could be trained in the field of distribution;

2. Disadvantaged youth who might have been denied a training station, could be reached by distribution programs and receive training in a laboratory setting;

3. The learning experiences in the laboratory can be controlled by the coordinator;

4. Specialized skills and competencies can be provided for individual student needs.

Tangible results of the project included:

1. The development of materials and procedures for training distribution students through the simulation approach;

2. The training and placement of the majority of the 128 students who enrolled in the developmental programs and participated both years.

OBJECTIVES OF THE INTERNSHIP TRAINING PROGRAM

The major objective of the internship training program is to supplement the simulated occupational experience program with practical "hands-on" experiences by on the job training.

More specifically, through experiences obtained from the developmental program, the guidelines herein should assist teacher-coordinators to:

1. Initiate Internship Training in distributive education programs utilizing the simulated method of teaching.

2. Follow procedures for utilizing local businesses as intern training stations to enrich the simulated occupational experience program.

3. Utilize procedures for working with training sponsors in conducting the internship experiences in the local businesses.

4. Complete Internship Agreement (IT-2) and Training Plans (IT-3) needed for the Internship Program which fulfill the requirements of the Fair Labor Standards Act.

5. Place students for internship training.

6. Conduct regular meetings with training sponsors.

7. Supervise students placed in local business cooperating in the internship program.

8. Evaluate students' progress in the internship program.

INITIATING AN INTERNSHIP PROGRAM

The initiation of an internship program in distributive education in your school is the first giant step in a well-conceived program of instruction. Initiation is the beginning, it is the determining factor that will influence students, parents, faculty, administration, and the business community acceptance of this program.

The following initiating procedures are presented as suggestions for implementing your internship program. Priorities have been assigned to these procedures by sequence. Do remember, however, that well written plans are only well written when they become well implemented actions. Always remember that the students, parents, faculty and businessmen will develop their attitude toward acceptance or rejection of the internship program on the planning, promotion and actions of the distributive education teacher-coordinator. So, be prepared, have a plan of action. Plan your work and work your plan.

If you plan to initiate an internship program, you should start your planning at least a year in advance. The following procedure, or steps, is a suggested plan for initiating an internship program:

1. Meet with the administrators to explain benefits of the program and procedures to be followed to initiate the program and gain approval.

2. Make personal contacts with a sample of the businesses in your local community to explain the program and evaluate responses.

3. Conduct a survey of local businesses to determine the number of businessmen that will serve as a training sponsor. (IT-1)

4. Contact the State Department to obtain approval for incorporating the program.

5. Organize an advisory committee of local businessmen to assist in planning and initiating the program.

6. Conduct a planning meeting of administrators, teacher-coordinator, participating businesses and advisory committee members. This meeting will serve the following purposes:

    a. To determine the length of time and days per week the program will be conducted.

    b. To explain the Internship Training Agreements and Training Plans, (IT-2, IT-3)

    c. To set up orientation meetings with personnel who will be supervising the students within the businesses.

7. Establish a method and procedure for transporting students to training stations.

In summary, visit an on-going internship program. Take your principal and guidance counselor with you. Talk to your students--determine how many are interested in participating

in the internship program. Survey local businesses to determine interest. Discuss the program with the State Department and organize an advisory committee.

SCHOOL ADMINISTRATION

A successful program is dependent upon full cooperation and understanding of your internship program by your administrators, faculty, counselors and students. The internship plan must have the endorsement and support of the school's administrators. The teacher-coordinator must establish and maintain an adequate and functioning system (rules and regulations) to insure harmony and rapport among school officials. The coordinator must sell the internship program to the administration by emphasizing the need for such a program to both students and community. You must keep your administration informed as to how the program is progressing. Ask your administrator to assist in selecting, organizing and initiating an advisory committee. Also, your administrator and guidance counselor should visit and talk with local businessmen concerning the program.

There should be an agreement as to whether the teacher-coordinator should call on local businessmen to obtain information concerning classroom instruction and parents. An agreement should be made as to the amount of time the teacher-coordinator should spend visiting local merchants.

DUTIES OF TEACHER-COORDINATOR

The duties of the distributive education teacher-coordinators are many. The success of the program depends upon how well the coordinator performs the many functions he has to carry out. Six areas should be considered: (1) Public Relations; (2) Programming; (3) Training; (4) Coordination of Classroom Instruction; (5) Guidance; and (6) Records and Reports. A brief description of these duties are given below:

1. Public Relations

    a. Work with school administration, school counselors, students, parents and local businessmen.

    b. Work with civic and school groups.

    c. Prepare publicity on program.

    d. Confer with prospective students, their parents and training sponsors. Remember that the best way to overcome any resistance you might have from your public is to prepare well enough that the problems never arise.

2. Programming

   a. Make community survey

      (1) What should be taught
      (2) Internship stations available

   b. Selection of Advisory Committee

   c. Assist in arranging students' school and internship schedule

   d. Provide internship training stations

3. Training

   a. Teach classes

   b. Prepare training plans and training agreements, (IT-2, IT-3)

   c. Visit students in training stations

   d. Visit and confer with training sponsors

4. Coordination of Classroom Instruction

   a. Placement of students in training stations

   b. Coordinate classroom activities with internship experiences as outlined in the training plan

   c. Follow-up on students' program

5. Guidance

   a. Assist counselor in the selection of students

   b. Help students determine a career objective

   c. Counsel students

   d. Confer with training sponsor on student's progress in the business.

6. Records and Reports

   a. Prepare school reports

   b. Make out internship schedules

   c. Prepare evaluation of student's progress at training station (IT-5)

   d. Prepare reports for local and state administration as necessary

SCHEDULING INTERNSHIP

It is suggested that students be placed in the training stations during the spring term, as this period is usually a slower season, thus providing employees with more time to devote to the students. It is also anticipated the business would not lose as much productivity of its employees.

The program is structured for the students to spend eighteen weeks in the internship program observing the various businesses. For example, the school week could consist of Monday, Wednesday, and Friday in the classroom-laboratory setting, and Tuesdays and Thursdays in the training stations--the classroom instruction will be augmented by their experiences in the training station. Remember that training plans must be adjusted and evaluated, with classroom and laboratory instruction being provided to meet the student's needs.

ROTATION OF STUDENTS

The eighteen week internship period (semester) should be divided among those local cooperating businesses which complement the student's career objective. For example, students could be assigned to nine businesses for two weeks per business. The students would be rotated among the various jobs, areas, departments, or operations to be observed. The final schedule of the students would depend upon the number of businesses available and the number of operations within the business that the student's training plan indicated a need to be observed. An example rotation schedule is included in the appendices to this guide.

ORIENTATION OF TRAINING SPONSORS

Prior to the placement of students in the internship program, an orientation of the owners or managers, and of the employees who will provide direct supervision of the students, should be held. The following information should be covered during the meeting:

1. The aim and objectives of internship program.
2. The Federal and State Labor Regulations concerning the internship program.
3. The procedures for rotation of students on the job.
4. The teacher-coordinator's role in the program.
5. The training agreement and training plans.
6. The procedures for students reporting and learning the training stations. (IT-4)

7. The expectations on the part of the businesses and the students.

8. The evaluation of student's performance in the training station. (IT-5)

9. The communication channels between the businesses and the school.

ORIENTATION OF STUDENTS

The teacher-coordinator will have discussed the internship training program with the students throughout the first semester. However, prior to placement of students, a formal orientation should be provided for the students. The following items should be discussed and any questions or concerns answered; and any suggestions or concerns noted from the meeting of the businessmen could be discussed:

1. Review the aims and objectives of the program.

2. Review any procedures, rules, or regulations established for internship program.

3. Review, discuss and complete training agreements. (See appendix for copy.) (IT-2)

4. Note of any dress codes and policies of the cooperating businesses.

5. Note of any procedures for completing records and forms to be used.

6. Note of any training plans and rotation summaries. (See appendix for copy of training plan and rotation summary.)

LABOR REGULATIONS

The Kentucky and Federal labor laws concerning placement of students in businesses for an internship training program must be followed to the letter. It must be remembered that the status of the students and training sponsor in the training stations must be that of a student-instructor and not an employer-employee. In order that the minimum wage can be waived so that the students would be classified as student-learners; there are six labor criteria that must be met:

1. The training, even though it includes actual operation of the facilities, of the employee is similar to that which would be given in a vocational school.

2. The training is for the benefit of the trainee or students.

3. The trainees or students do not displace any regular employee, but work under their close supervision (on a one-to-one basis.)

4. The employer that provides training derives no immediate advantage from the activities of the trainee or students, and on occasion, his operation may actually be impeded.

5. The trainee or students are not necessarily entitled to a job at the conclusion of the training period.

6. The employer and the trainee or student understand that the trainee or students are not entitled to wages for the time spent in training.

Also, the following point should be considered and discussed:

1. All students involved in the internship program will be rotated and receive a variety of experiences in the business(s).

2. The specific duties and limitations of the students while enrolled in the internship program.

3. All students involved in the internship program must have either school insurance or evidence of other insurance that covers them under these conditions so that the cooperating businesses will not be held liable for injury.

4. That a student-instructor relationship will exist between students and employees in the cooperating businesses.

The State and Federal Department of Labor should be informed of the internship program so that cooperation between Labor Department and the cooperating business can be coordinated. See Page 31-33 for a copy of letter from U.S. Department of Labor and recommendations of the Kentucky Department of Labor concerning the internship program.

DEVELOPMENT OF INTERNSHIP AGREEMENT

After the training schedule in the training stations has been developed, the teacher-coordinator should complete an internship agreement between the student , the parent, the school, and the training sponsor. An example of an internship training agreement is included in this guide. The training agreement must be developed in accordance with the rules and regulations outlined by the labor departments.

Remember! The student must be supervised on a one-to-one basis with an employee and the student cannot displace a regular employee. The student may, however, be allowed to perform routine duties if observed and supervised by a regular employee.

Copies of the internship training agreement should be made and distributed as follows:

1. One copy to the training sponsor for each student to be rotated with the student.

2. One copy to the parent.

3. One copy for the teacher-coordinator's file.

4. One copy for the student's use.

It is also recommended for schools using the internship for the first time, that a copy be sent to the State Department of Education, Bureau of Vocational Education.

TRANSPORTATION OF STUDENTS

Students participating in the internship program, as in the cooperative program, are still under the direct supervision of the local school. They are released from the formal classroom setting, but are still in school. Therefore, the teacher-coordinator must make arrangements for transporting the students to the cooperating businesses. In some instances, the business community may be close enough for the students to walk. However, the teacher-coordinator should discuss and obtain an agreement on procedures for going from school to the businesses and returning to school. Students should not be allowed to stop along the way.

SUPERVISION OF STUDENTS

The teacher-coordinator must conduct supervisory visits on a frequent and regular basis. Each student should be visited at least once a week, depending upon the students' training plan, the students' rotation schedule and the training sponsor. The teacher-coordinator should observe the following during a supervisory visit.

1. That the student is being supervised by an employee on a one-to-one basis.

2. That the student is receiving information and instruction, not just standing around.

3. That the student is recording his observations and training received.

4. That the student is being rotated among the various jobs within the department or the business.

5. Experience and concerns, according to students' training plan and needs that need to be discussed in the classroom.

6. That evaluations are being made on a daily basis by student and training sponsors.

7. To determine if any problems or concerns have occurred.

It is suggested that a monthly meeting should be held for the training sponsors to evaluate the program, suggest improvements, and to solve any problems that have occurred.

DEVELOPING THE TRAINING PLAN

The development of the individual student's training plan (see IT-3) is very important. The training plan outlines a definite plan of progressive experiences and learning activities based on the student's current career objective. It serves as a schedule or step by step plan for training to be used by:

1. The training sponsor, to aid in planning the rotation schedule and on-the-job instruction.

2. The teacher-coordinator, to aid in planning the classroom instruction to correlate with the on-the-job instruction.

3. The student, to project his career objectives both in school and on-the-job.

4. It also serves to indicate to the employee that he has certain responsibilities in the instructional program.

The training plan should be prepared cooperatively by the training sponsor, the teacher-coordinator, and the student trainee. The plan should be made out before the student is placed in an internship. The plan should serve as a guide for the teacher-coordinator in planning the related classroom instruction and in identifying individual instructional needs. The training plan should identify specific training responsiblities and should be completed only after conferences between the student, teacher-coordinator and the training sponsor. The parents should also have an opportunity to evaluate the training plan before a final agreement is made. Listed below are some important contributions which the training plan can make to the development of a successful internship program:

1. The training plan provides the students, teacher-coordinator and training sponsor a means to arrive at specific occupational objectives.

2. It offers tangible evidence to parents, employers, school personnel, students and businessmen that the internship program is an educational program.

3. The training plan encourages the training sponsor to rotate and instruct the student in progressively more difficult and varied on-the-job experiences.

4. It provides the students with an opportunity to fully explore their career objectives.

5. The training plan documents student experiences as he develops competencies and skills in the training station.

6. It provides the basis for meaningful coordination visits and progress reports.

7. It can help each student learn to evaluate his own progress.

8. It offers the teacher-coordinator a concrete basis for evaluating training experiences.

9. The training plan ties together the classroom instruction and on-the-job acitvities.

The value of the training plan in an internship program cannot be over emphasized. The training plan is the heart of the internship program and must be carefully planned, developed, and evaluated.

The value of training plans can be summarized as follows:

1. Training plans correlate classroom learnings with the internship phase of the program. A major objective of the training plan is to organize the instruction into a step-by-step sequence which assists the student in achieving his occupational goal and provide direction for the training sponsor.

2. Training plans establish criteria for training station selection. When training plans are made or adapted for each student and each training station, the on-the-job internship requirements can be analyzed and planned. Through this process the student-trainee and training stations can be matched to meet the student's career objectives.

3. Training plans help the teacher-coordinator keep up to date. As the teacher-coordinator directs the development of the training plan, he has a chance to update and review his own occupational knowledge concerning the area of training and keep up with many of the experiences which should be included in the student's training program.

4. Training plans serve as a guide for the instruction of the student-trainee. The training plan gives the teacher-coordinator a guide from which to determine what the student can do and what his performance should be in order to reach his occupational goal.

5. Training plans serve as a guide for program evaluation. During the school year the teacher-coordinator should periodically evaluate each student and training station to assure the goals and objectives of the internship program are being met.

6. Training plans provide and assure the employer a responsibility in planning the training experience. When a training sponsor helps develop a training plan, he realizes its functions in the learning process and assumes more responsibility for implementing the on-the-job activities.

7. Training plans help the employer to realize that the internship is a planned training program. When a training plan is cooperatively written, training sponsors have an input, and hopefully, realize that the internship is an organized program leading to the student-trainee's career objective and adjusted to the training sponsor's business.

8. Training plans help identify the goals of the student. The training plan should reflect the goals of the students and should be written for each individual student. When training plans are being prepared, the student should have a chance to express his desires and interests as they relate to his internship, the training station, and his career objective.

9. Training plans provide a tool for the student to evaluate his own experiences. The student can compare his progress with the experiences outlined in the training plan in order to see how well he or she is progressing toward the successful fulfillment of his stated occupational goals.

REVISION OF TRAINING PLANS

A training plan must be thought of as a guide for the student, the teacher-coordinator, and the training sponsor to use in the internship program. It should be developed as precisely as possible, yet flexible and subject to change. Some plans may be difficult to follow exactly and meet all the student's expectations; however, they should be developed and revised to meet local training stations.

EVALUATION

A comprehensive program of evaluation to ascertain the effectiveness of the internship program should include the comparison of student, training sponsors, and teacher-coordinator internship performance with program objectives. The evaluations should include the performance of the students enrolled in the internship program, the effectiveness of the classroom instruction to determine the effectiveness in assisting students to attain their career objectives.

The students should evaluate their experiences in the local businesses daily and record experiences on their training plans. Upon completion of each visit, the student should be evaluated by the training supervisor. An example of a student's rotation summary and supervisor's evaluation is included in the Appendix.

The teacher-coordinator should prepare a progress chart for recording the student's progress in business or businesses. This will assist in evaluating the progress according to student's career objectives as outlined in training plans. An example of a progress chart may be seen in IT-6.

It is very important that students keep a complete record of their experiences. This vital information will assist the teacher in providing and adjusting the classroom and laboratory instruction. An example of this summary of experiences is presented in the Appendix.

APPENDIX

ROTATION # 1 EXAMPLE

Rotation 1 - Observation 1

Business	A*	B	C	D	E	F	G	H	I
Dept. I	1**	3	5	7	9	11	13	15	17
Dept. II	2	4	6	8	10	12	14	16	18
Dept. III									19
Dept. IV									20

Rotation 1 - Observation 2

Business	A	B	C	D	E	F	G	H	I
Dept. I									20
Dept. II	1	3	5	7	9	11	13	15	17
Dept. III	2	4	6	8	10	12	14	16	18
Dept. IV									19

Rotation 1 - Observation 3

Business	A	B	C	D	E	F	G	H	I
Dept. I									19
Dept. II									20
Dept. III	1	3	5	7	9	11	13	15	17
Dept. IV	2	4	6	8	10	12	14	16	18

Rotation 1 - Observation 4 on the following page.

* Letters denote Business

** Numbers denote student

Rotation Example (Cont.)

Rotation 1 - Observation 4

Business	A	B	C	D	E	F	G	H	I
Dept. I	2	4	6	8	10	12	14	16	18
Dept. II									19
Dept. III									20
Dept. IV	1	3	5	7	9	11	13	15	17

ROTATION # 2 Example

Rotation 2 - Observation 1

Business	A	B	C	D	E	F	G	H	I
Dept. I	17	1	3	5	7	9	11	13	15
Dept. II	18	2	4	6	8	10	12	14	16
Dept. III	19								
Dept. IV	20								

Rotation 2 - Observation 2

Business	A	B	C	D	E	F	G	H	I
Dept. I	20								
Dept. II	17	1	3	5	7	9	11	13	15
Dept. III	18	2	4	6	8	10	12	14	16
Dept. IV	19								

Rotation 2 - Observation 3

Business	A	B	C	D	E	F	G	H	I
Dept. I	19								
Dept. II	20								
Dept. III	17	1	3	5	7	9	11	13	15
Dept. IV	18	2	4	6	8	10	12	14	16

Rotation 2 - Observation 4 on the following page.

Rotation # 2 Example (Cont.)

Rotation 2 - Observation 4

Business	A	B	C	D	E	F	G	H	I
Dept. I	18	2	4	6	8	10	12	14	16
Dept. II	20								
Dept. III	19								
Dept. IV	17	1	3	5	7	9	11	13	15

Rotations of Businesses 3-9 moves across the Grid as in examples.

SUGGESTED CALENDAR OF ROTATION

JAN 1975						
s	m	t	w	t	f	s
			1	2	3	4
5	6	R-1 7	8	R-1 9	10	11
12	13	R-1 14	15	R-1 16	17	18
19	20	R-2 21	22	R-2 23	24	25
26	27	R-2 28	29	R-2 30	31	

FEB 1975						
s	m	t	w	t	f	s
						1
2	3	R-3 4	5	R-3 6	7	8
9	10	R-3 11	12	R-3 13	14	15
16	17	R-4 18	19	R-4 20	21	22
23	24	R-4 25	26	R-4 27	28	

SUGGESTED CALENDAR OF ROTATION

MAR 1975						
s	m	t	w	t	f	s
						1
2	3	R-5 4	5	R-5 6	7	8
9	10	R-5 11	12	R-5 13	14	15
16	17	R-6 18	19	R-6 20	21	22
23 30	24 31	R-6 25	26	R-6 27	28	29

APR 1975						
s	m	t	w	t	f	s
		R-7 1	2	R-7 3	4	5
6	* 7	8	9	10	11	12
13	14	R-7 15	16	R-7 17	18	19
20	21	R-8 22	23	R-8 24	25	26
27	28	R-8 29	30			

* Set aside one week for spring break

SUGGESTED CALENDAR OF ROTATION

MAY 1975						
s	m	t	w	t	f	s
				R-8 1	2	3
4	5	R-9 6	7	R-9 8	9	10
11	12	R-9 13	14	R-9 15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

DEPARTMENT OF LABOR

FRANKFORT, KENTUCKY 40601

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COMMISSIONER

SEP 25 1973

DIVISION OF
LABOR STANDARDS

CHARLES E. McCOY
DIRECTOR

September 24, 1973

Mr. Robert M. Schneider, Director
Resources Development Unit
Bureau of Vocational Education
Department of Education
Frankfort, Kentucky 40601

Dear Mr. Schneider:

This office is in receipt of your attached proposal for a developmental program in Distributive Education.

KRS 337.010(3)(f) defines "employer" as any person who employs an employe and includes any person acting directly or indirectly in the interest of an employer in relation to an employe.

KRS 337.010(3)(g) defines "employe" as any person employed by or suffered or permitted to work for an employer.

There have been no court decisions made in Kentucky which clearly defines what employ means; therefore, the only decision we have to follow is the criteria the Federal authorities use in determining an employer-employe relationship under the Fair Labor Standards Act.

It is the opinion of this office that if the criteria outlined in the letter dated September 14, 1973, from Mr. Robinette is followed, we would not consider the students participating in this program employes.

If you have any questions regarding this matter, please feel free to contact me.

Respectfully yours,

Charles McCoy

Charles McCoy
Director

CMc/sc

U.S. DEPARTMENT OF LABOR
EMPLOYMENT STANDARDS ADMINISTRATION
Wage And Hour Division
600 Federal Place, Room 187E

SEP 17 1973

Louisville, Kentucky 40202

DATE: September 14, 1973
REPLY TO ATTN OF:

SUBJECT: Developmental Program in Distributive Education Project

TO: Mr. Robert M. Schneider, Director
Resources Development Unit
Bureau of Vocational Education
Department of Education
Frankfort, Ky. 40601

This is in reply to your letter of September 12, 1973 requesting our comments on your proposed project.

Based on the information contained in the proposal, the training program appears to meet the necessary requirements and the students participating in the program therefore are not considered "employees" within the meaning of the Fair Labor Standards Act.

In order to keep your file complete on this matter I would like to repeat our guidelines. The Courts have made it clear that the employee relation under the Act is broader than the traditional common law concept. The difference between the Fair Labor Standards Act employee relation and common law relation arises from Section 3(g) of the Act which defines "employ". Whether trainees are employees of an employer under the Act will depend upon all of the circumstances surround their activities on the premises of the employer. If all six of the following criteria apply, the trainees or students are not employees within the meaning of the Fair Labor Standards Act:

1. The training, even though it includes actual operation of the facilities of the employer, is similar to that which would be given in a vocational school;

2. The training is for the benefit of the trainees or students;

3. The trainees or students do not displace regular employees, but work under their close observation;

4. The employer who provides the training derives no immediate advantage from the activities of the trainees or students, and on occasion his operations may actually be impeded;

(Continued on Page 2)

5. The trainees or students are not necessarily entitled to a job at the conclusion of the training period; and,

6. The employer and the trainees or students understand that the trainees or students are not entitled to wages for the time spent in training.

If you have any further questions or need additional information, please let me know.

Richard Robinette
Area Director

SAMPI E SURVEY

_____
SCHOOI

INTERNSHIP TRAINING PROGRAM BUSINESS SURVEY

Name of Business: _____

Address: _____

_____

Phone: _____

Manager: _____

You have been contacted on the objectives of the Internship Training Program. Would you please complete the following questionnaire on your ability to provide training stations for the distributive education students.

1. Do you have difficulty obtaining employees who are interested in their work?

   Yes____

   No ____

2. Do you think it would help students to decide which occupation they desire to seek if they could observe the various types of jobs before they make this decision?

   Yes____

   No _____

3. Would you be willing to place students in your business one to two hours twice a week to observe your operation?

   Yes ____

   No _____

If the answer to question # 3 was yes, please answer the following questions.

Internship Training Program Business Survey (Cont.)

4. How many students could you accomodate?

No. _____

5. Could you place these students on a one-to-one ration with your personnel?

Yes _____

No _____

6. Please list the types of jobs available for students to observe:

_____

_____

_____

_____

_____

_____

Additional Comments:

_____
Position

Thank you for your cooperation in filling out this survey.

_____
Teacher-Coordinator
Distributive Education
School Name

INTERNSHIP AGREEMENT

For Supervised Occupational Experience of
Distributive Education Students at
Daviess County Vocational School

Intern (Student): _____

Home Address: _____

_____

_____

Home Telephone Number: _____

School Telephone Number: _____

Place of Internship: _____

Address: _____

_____

Supervisors of Intern: _____ Dept. _____

_____ Dept. _____

_____ Dept. _____

_____ Dept. _____

Place of Internship: _____

Address: _____

_____

Supervisors of Intern: _____ Dept. _____

_____ Dept. _____

_____ Dept. _____

_____ Dept. _____

Place of Internship: _____

Address: _____

_____

Supervisors of Intern: _____ Dept. _____

_____ Dept. _____

_____ Dept. _____

_____ Dept. _____

Place of Internship: _____

Address: _____

_____

Supervisors of Intern: _____ Dept. _____

_____ Dept. _____

_____ Dept. _____

_____ Dept. _____

Place of Internship: _____

Address: _____

_____

Supervisors of Intern: _____ Dept. _____

_____ Dept. _____

_____ Dept. _____

_____ Dept. _____

Place of Internship: _____

Address: _____

_____

Supervisors of Intern: _____ Dept. _____

_____ Dept. _____

_____ Dept. _____

_____ Dept. _____

Place of Internship: _____

Address: _____

_____

Supervisors of Intern: _____ Dept. _____

_____ Dept. _____

_____ Dept. _____

_____ Dept. _____

Place of Internship: _____

Address: _____

_____

Supervisors of Intern: _____ Dept. _____

_____ Dept. _____

_____ Dept. _____

_____ Dept. _____

Place of Internship: _____

Address: _____

_____

Supervisors of Intern: _____ Dept. _____

_____ Dept. _____

_____ Dept. _____

_____ Dept. _____

To promote a basis of understanding, promote business relations and enrich the training of the Distributive Education students, this memorandum of understanding is established on _____, 197_.

The Internship Program will start on _____, 197_, and will end on or about _____.

IT IS UNDERSTOOD THAT THE TRAINING SPONSOR WII L:

_____ Provide the intern with opportunities to observe and learn how to do as many skills and competencies as possible.

_____ Instruct the intern in the ways which he has found desirable in performing his duties and handling his management problems.

_____ Help the teacher-coordinator make a weekly evaluation of the intern's performance.

_____ Avoid subjecting the intern to unnecessary hazards.

_____ Provide training that is beneficial to the intern.

_____ Rotate on a regular basis the student among the various departments of their business.

_____ Not pay the intern wages for the time spent in their business.

_____ Not take the place of a regular employee in the business.

_____ Not allow the intern to perform tasks in their business without direct supervision by a regular employee.

_____ Explain to interns that they are not necessarily entitle to a job upon completion of the Internship.

_____ Assist the teacher-coordinator in arranging a conference with the student upon completion of each rotation in the business.

_____ And, it is understood by the training sponsor that the student will receive more benefits from Internship Programs that the business, and that in some instances the intern may be an expense to the business.

THE INTERN AGREES TO ITEMS CHECKED BELOW:

_____ Keep the training sponsors interest in mind and be punctual, dependable, and courteous at all times.

_____ Will not receive any wages for the time spent during the internship.

_____ Will not necessarily be entitled to a job upon completion of internship.

_____ Keep such records and make such reports as the school and/or training sponsor may require.

_____ Follow instructions, avoid unsafe acts, and be alert to unsafe conditions.

_____ Will not perform tasks in the business unless supervised by an assigned employee.

_____ Develop a training plan with the training sponsor and teacher-coordinator.

THE TEACHER-COORDINATOR, IN BEHALF OF THE SCHOOL AGREES TO:

_____ Provide transportation for students from Daviess County Vocational School to their place of training, and back to school.

_____ Visit and supervise the student during the internship for the purpose of information, instruction and to insure that the intern receives the most education from his experiences.

_____ Show discretion at the time and cirucmstances of their visits especially when interns are actively engaged in training.

_____ Others.

_____ Others.

THE PARENT AGREES TO:

_____ Assist in promoting the value of the students experiences by cooperating with the training sponsor and the teacher-coordinator.

_____ Satisfy himself in regards to the educational experiences made available to the student.

Intern(Student)	Parent
Teacher-Coordinator	Training Sponsor
Training Sponsor	Training Sponsor
Training Sponsor	Training Sponsor
Training Sponsor	Training Sponsor
Training Sponsor	Training Sponsor

Copies to: Teacher-Coordinator, Training Sponsor, Student, and the State Department.

TRAINING PLAN
INTERNSHIP TRAINING PROGRAM
DISTRIBUTIVE EDUCATION

Student-Learner _____ Birth Date _____

School _____ S. S. # _____

Career Objective _____

Training Station _____

Address _____

Training Sponsor _____ Rotation No. _____

DEPARTMENTS TO BE OBSERVED DURING INTERNSHIP

1.

2.

3.

4.

5.

OUTLINE OF OCCUPATIONAL EXPERIENCES

Department	Class Room Experiences	Evaluation*
1.		

Observations

a.
b.
c.
d.
e.
f.
g.
h.

*Rate observation 1 to 5. 1=Excellent 5=Poor

Outline of Occupational Experiences (Cont.)

Departments	Class Room Experiences	Evaluation

2.

Observations

a.
b.
c.
d.
e.
f.
g.
h.

3.

Observations

a.
b.
c.
d.
e.
f.
g.
h.

4.

Observations

a.
b.
c.
d.
e.
f.
g.
h.

5.

Observations

a.
b.
c.
d.
e.
f.
g.
h.

(SAMPI E) (IT - 3)

TRAINING PI AN
INTERNSHIP TRAINING PROGRAM
DISTRIBUTIVE EDUCATION

Student-I earner Darlene Russell Birth Date 4/20/56

School Daviess County State Voc. Tech. Sch. S. S. # 400-86-6375

Career Objective _____

Training Station Wyndall's #5

Address 2517 Frederica

Training Sponsor Mrs. Betty Turner

DEPARTMENTS TO BE OVSERVED DURING INTERNSHIP

1. Meat Department	6.
2. Cashier	7.
3. Grocery	8.
4. Produce	9.
5.	10.

OUTLINE OF OCCUPATIONAI EXPERIENCES

Department	Classroom Experiences	Evaluation*
1. Meat Department - Morris Carter		
Observations		
a.	Observed the meat counter.	1
b.	Mr. Carter explained how the meat is arranged in the counter.	1
c.	Explained the cuts of meat; side-rib, loin, chuck, round.	1
d.	"Meat is cut on a day-by-day basis."	
e.	Observed meat being cut; observed liver being sliced.	1
f.	Observed the refrigeration of the meat.	2
g.	Observed chickens being packaged and weighed.	1
h.	Observed meat being weighed and wrapped. "Meat is weighed before it is wrapped on the sterofoam plate in foil (Clear)."	1
i.	Mr. Carter explained the basis of pricing meat. "Boneless meat is higher in price than meat that still contains the bone."	1
j.	Observed meat that has expired date being wrapped, weighed, and counted.	1

Outline of Occupational Experiences (Cont.)

Department	Classroom Experiences	Evaluation

2. Meat Department - Morris Carter

Observations

a. Talked with Mr. Carter about various happenings in the meat department and about how people buy meat. 1
b. Observed meat counter, pre-packed meat & meat packed by the department. 1
c. Learned that meat that turns colors is removed from the counter and later ground into ground beef. 1
d. Learned that a new lighting system (pinkish lights) has been placed over the meat counter to help preserve the coloring in meat. 1
e. Mr. Carter explained the pricing & percentage of all meat products. 1
f. Observed the turkeys--a selling product at this time of the year (Thanksgiving). Observed pricing of turkeys depending on grade. 1

3. Cashier

Observations

a. Observed cashier checking out a customer who had purchased an enormous amount of meat, which totaled over $100. Consumer stamps--WOW! 1
b. Observed cashier checking out customers who had purchased different amounts of products. 1
c. Observed the process of checking customers out--moving items closer to finger-tip reach, use of cash register, return of change, giving the consumer stamps, and bagging the groceries. 1
d. Observed cashier writing down items that were on sale on a paper that was taped to the cash registers. 1
e. Observed procedure of the receipt of a check from a customer. 1

4. Grocery - Gary Sisk

Observations

a. Observed Mr. Sisk straightening up a display that had fallen. 1
b. Observed while Mr. Sisk checked a box of checks, made telephone calls and answered the phone. 1
c. Mr. Sisk explained the basis for percentage on merchandise. 1
d. Explained ways to display products. 1
e. Explained how each aisle of merchandise is placed. 1
f. Explained how sale items are placed. 1
g. Observed while a salesman sold Mr. Sisk Christmas items to be resold in the store. 1

Outline of Occupational Experiences (Cont.)

Department	Classroom Experiences	Evaluation

5. Produce - Bruce Russell

Observations

a. Observed Mr. Russell packaging pecans. 1
b. Observed the packages being weighed. 1
c. Observed the ends of the packages being twisted & stapled. 1
d. Observed the register that determines the price of produce while Mr. Russell explained how pricing is calculated by poundage. 1
e. Observed the register release price tags and another type of machine that radiated heat to the surface of the tag to make it stick to the clear baggies that the pecans were packaged in. 1
f. Observed Mr. Russell preparing lettuce to be packaged. 1
g. Removed lettuce from a box in the refrigerator to his work area. 1
h. Removed the leaves (dead) from the lettuce and cut bad spots off. 1
i. Observed Mr. Russell packaging the heads of lettuce. 1
j. Observed Mr. Russell packaging some onions; removing the bad ones from the package. 1
k. Observed Mr. Russell weighing the onions. 1
l. Observed Mr. Russell weighing bananas for a customer. 1

6.

Observations

a.
b.
c.
d.
e.
f.
g.
h.

7.

Observations

a.
b.
c.
d.
e.
f.
g.
h.

SUMMARY OF OBSERVATION EXPERIENCES

Student-Learner _____ Rotation No. _____

Observation Station _____ Dates _____

Signed _____

Outline of Occupational Experience (Cont.)

Department	Classroom Experiences	Evaluation

8.

Observations

a.
b.
c.
d.
e.
f.
g.
h.

9.

Observations

a.
b.
c.
d.
e.
f.
g.
h.

*Rate observation i to 5. 1=Excellent 5=Poor

located, counts all the orders for accuracy, which he keeps records of all orders made and the ones received, then after he counts the orders for accuracy, he delivers the merchandise to the department in which it belongs. I admire Mr. Smith because he takes many a footstep in even fifteen short minutes.

In the men's department, I observed Mrs. Barton making sales to her customers. With her assistance, I learned how to use the cash register and rang up most of the sales during the period I was with her. She also showed me how to use the charge card machine. Every time a customer comes up to be checked out, the saleslady asks whether the sale is cash or charge. I learned from Mrs. Barton that every item in the store has a number and that certain tags are saved and sent in to the company from the office for re-ordering merchandise. I observed Mrs. Barton taking an inventory of men's knit slacks that were to be on sale the following week.

The boy's department is similar to the men's department. I observed Mrs. Blunk making sales, checking out customers, and stocking a new order of boys' pants. Mrs. Blunk told me that one lays merchandise out on a table with sizes left to right and all tags should show so customers won't have any trouble finding out about the information on the product. I also learned how to display products that would catch the eye of the customer.

EXAMPLE OF STUDENT'S EVALUATION

SUMMARY OF OBSERVATION EXPERIENCES

Student-Learner Darlene Russell Rotation No. 1

Observation Station J. C. Penney's Dates Oct. 9 - Nov. 6, 1973

I have learned much while participating in the Internship Training Program at J. C. Penney's. The catalog department was very interesting. It deals mostly with orders, credit, and layaway. I enjoyed observing how order blanks are filled out from telephone calls and it was interesting to listen to a telephone order on an extension line while observing Mrs. Potter filling out the order blank. I also observed the teletype machine, the credit machine, and the files of all orders, and the order rooms filled with all the packages. Although I am sure things get pretty hectic at times and a lot of work is involved, I believe I would enjoy working in such a department.

In the cash department, I observed Mrs. Stout counting out and packaging all the money that was received the day before. I realize that this department is very important, because if someone didn't keep track of all the money received and the money going out, then the business would be in a bad financial status.

The stockroom is of great interest, but I don't think a girl could handle all those heavy loads. Mr. Smith carries all the shipments from the upstairs rear door to the basement where the stockroom is

I observed an inventory count of boy socks that are going to be discontinued.

In the fashions department, I observed the new line of fall and winter clothing. Mrs. Young waited on many customers who were looking for new winter coats--this cold weather is really coming to us too fast! I also observed Mrs. Young working on inventory sheets in the main office, and I observed her checking all the cash registers in the store for a customer count. This is being done to see how much help will be needed and at what time of the day during the next two months--Christmas rush. Working in the fashions department would be interesting, I think, because I "love" clothes.

Household items such as bedspreads, pillows, draperies, bathroom essentials, material, and sewing goods may be purchased in the household department at J. C. Penney's. I observed Mrs. Evans hanging bedspreads on the racks. I learned that the purpose of this is to let the customers look at and test the texture of the product before they buy. Plastic coverings are placed over the top of the bedspreads with information about the bedspreads taped inside the plastic in view of the customer. I observed Mrs. Evans waiting on customers and ringing up sales.

I feel that observing the different departments at J. C. Penney's has helped me to appreciate the work of each of the department workers. I enjoyed my three weeks there.

EXAMPLE OF STUDENTS' EVAI UATION

SUMMARY OF OBSERVATION EXPERIENCE

Student-Learner Darlene Russell Rotation No. 2

Observation Station Wyndall's #5 Dates Nov. 6 - Dec. 11, 1973

While stationed at Wyndall's #5, I have observed four different departments. The four departments include the meat department, cashier, grocery, and produce.

The first department I was located in was the meat department. Here I observed the meat counter while Mr. Morris Carter explained how the meat is arranged in the counter. Strips of articicial greenery is placed between the meat and one of its purposes is to "attract the eye" of the customer.

Mr. Carter explained the cuts of meat and I learned that the department receives the whole side of a beef and it is then cut down to four basic cuts--rib, loin, chuck, and round. I observed some of the meat being cut, and I observed liver being sliced and put in containers. Mr. Carter told me that meat is cut on a day-by-day basis and this is done to insure freshness. I observed chickens being packaged and weighed. I observed meat being weighed and wrapped also. I learned that meat is weighed before it is wrapped in clear foil on sterofoam plates.

Mr. Carter explained the basis of pricing meat and the overall pricing and percentage of all meat products. I learned that

boneless meat is higher in price than meat that still contains the bone. Meat that has expired its date in the counter or has changed its color is refrigerated and later wrapped and weighed and sold to customers in larger amounts. I observed some of this type of meat being wrapped, weighed, and price recorded on an inventory basis. Some of the meat that turns color is removed from the counter and is ground into ground beef. A new lighting system (pinkish colored lights) has been placed over the meat counter to help preserve the coloring in meat. I learned that pre-packed meat, such as Field's, the spoiled are held over and the company replaces the meat with fresh packages.

Turkeys, the Thanksgiving feast meat, was an interesting item of discussion. I observed the pricing of the turkeys according to its grade. I learned that Butterball turkeys are more expensive than regular turkeys because they have been pre-basted, a shot of butter has been placed within the turkey.

The meat department also makes and packs some of the store's jello, pimento cheese spread, bologna salad, and ham salad. I learned that the ham salad is made up of part ham and part bologna, because customers won't buy the ham salad made completely with ham.

The second department I observed was the cashier. I observed the cashier checking out customers who had purchased different amounts of merchandise. I also observed the process of checking

the customers out--moving the items closer to finger-tip reach, use of cash register, procedure if a check is received or if coupons are used by customers, return of change, and the bagging of the groceries.

The third department of location was the grocery department of the store. I observed while Mr. Gary Sisk checked a box of checks and made telephone calls. Then Mr. Sisk explained the basis for percentage on merchandise. I learned that two high percentage items are usually placed on either side of a sale item so that a customer might buy a high percentage item when they buy a sale item. Mr. Sisk also explained ways to display products and how the products are placed on the shelves in the aisles. I learned that cakes and frostings are placed vertically so that when a customer buys a cake, the type of frosting it requires is located right above it at finger-tip reach. Brands are often placed together, too. I learned that bread is located at the front of the store in the first aisle, while milk is located nearer the back of the store in a far aisle. The purpose of this is primarily because milk and bread are the two main items that customers usually buy. When the customer comes into the store, he will cover a large area of the store to get these two products and in the meantime may see some other item he wants. I also learned that the candy supply is large and the sugar supply is small. This is basically because candy is of a higher percentage of sale than sugar.

The fourth department I was located in was Produce. Here I observed Mr. Bruce Russell packaging pecans. As the pecans were packaged, they were weighed and then twisted and stapled at the open end. A price tag was placed on each package and stacked in a grocery cart. Mr. Russell explained how the pricing is calculated by poundage. A heating device is used to make the price tag sticky so it will stick to the plastic baggies.

I have enjoyed my internship at Wyndall's #5 and I know that it has been a good learning experience.

Signed_____

(IT - 5)

DAVIESS COUNTY STATE VOCATIONAL TECHNICAL SCHOOL

INTERNSHIP DAILY STUDENT PROGRESS REPORT

Observation Station _____ Date _____

Student _____ Coordinator _____

Please circle the number indicating your evaluation:

Key: 1 Poor 2 Fair 3 Good 4 Excellent

Dependability:	Attended observation station on time	1 2 3 4
Cooperation:	Cooperative and gets along with others	1 2 3 4
Appearance:	Cleanliness and wears suitable work clothing	1 2 3 4
Responsibility:	Follows directions of supervisor	1 2 3 4
Interest:	Shows attention to work at hand	1 2 3 4
Application:	Filled out observations on Training Plan	1 2 3 4

What grade do you think this student deserves for his involvement in this Observation Station?

A Excellent, B Good, C Fair, D Poor, F Failure Grade _____

Supervisor's Comments:

Report filled out by _____

Position _____

Please staple report and return by student.

(IT-6)

STUDENT PROGRESS CHART - INTERNSHIP TRAINING

STUDENT _____

GRADE REPORT	# 1	# 2	# 3	# 4	# 5	# 6	# 7	# 8	# 9	FINAL GRADE

Rotation # 1 Training Station	Rotation # 4 Training Station	Rotation # 7 Training Station
Daily Evaluation # 1	Daily Evaluation # 1	Daily Evaluation # 1
Daily Evaluation # 2	Daily Evaluation # 2	Daily Evaluation # 2
Daily Evaluation # 3	Daily Evaluation # 3	Daily Evaluation # 3
Daily Evaluation # 4	Daily Evaluation # 4	Daily Evaluation # 4
Total Daily Evaluation	Total Daily Evaluation	Total Daily Evaluation
Training Plan # 1	Training Plan # 4	Training Plan # 7
Summary # 1	Summary # 4	Summary # 7
Rotation # 1 GRADE	Rotation # 4 GRADE	Rotation # 7 GRADE
Rotation # 2 Training Station	Rotation # 5 Training Station	Rotation # 8 Training Station
Daily Evaluation # 1	Daily Evaluation # 1	Daily Evaluation # 1
Daily Evaluation # 2	Daily Evaluation # 2	Daily Evaluation # 2
Daily Evaluation # 3	Daily Evaluation # 3	Daily Evaluation # 3
Daily Evaluation # 4	Daily Evaluation # 4	Daily Evaluation # 4
Total Daily Evaluation	Total Daily Evaluation	Total Daily Evaluation
Training Plan # 2	Training Plan # 5	Training Plan # 8
Summary # 2	Summary # 5	Summary # 8
Rotation # 2 GRADE	Rotation # 5 GRADE	Rotation # 8 GRADE
Rotation # 3 Training Station	Rotation # 6 Training Station	Rotation # 9 Training Station
Daily Evaluation # 1	Daily Evaluation # 1	Daily Evaluation # 1
Daily Evaluation # 2	Daily Evaluation # 2	Daily Evaluation # 2
Daily Evaluation # 3	Daily Evaluation # 3	Daily Evaluation # 3
Daily Evaluation # 4	Daily Evaluation # 4	Daily Evaluation # 4
Total Daily Evaluation	Total Daily Evaluation	Total Daily Evaluation
Training Plan # 3	Training Plan # 6	Training Plan # 9
Summary # 3	Summary # 6	Summary # 9
Rotation # 3 GRADE	Rotation # 6 GRADE	Rotation # 9 GRADE